

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

September 2, 2011

**National League of Postmasters'  
Notice of Intent to Conduct Cross-Examination of the  
United States Postal Service Witness Boldt**

Pursuant to 39 CFR §3001.30, Rule 30(e)(3) of the Rules of Practice and Procedure, and Commission Order No. 778, Intervenor the National League of Postmasters of the United States (the "League") hereby gives notice of its intent, through counsel, to conduct oral cross-examination at the September 8, 2011, hearing concerning the Postal Service's direct case, the testimony it has submitted, and its responses to discovery.

The Postal Service has offered only a single witness, James J. Boldt, in support of its broad request regarding "whether to continue providing retail and other services and products at approximately 3650...Post Offices...." (Request of the United States Postal Service for an Advisory Opinion on Changes in the Nature of Postal Services ("Advisory Opinion Request") at pg. 1.) As of the date this notice is due, most responses to the discovery directed to the Postal Service and Mr. Boldt remain due. For these

reasons, the League requests appropriate leeway in cross-examination of the Postal Service's direct case. The League also respectfully requests that it be allowed to reserve the opportunity to conduct follow-up cross-examination with respect to responses elicited through oral cross-examination conducted by others.

Counsel for the League intends to conduct cross-examination on the following topics, in addition to those otherwise identified above:

- The subjects and topics identified in the League's Interrogatories and Requests for Production of Documents previously served;
- Mr. Boldt's experiences with the range of customer needs and expectations in his two Postmaster assignments. (Boldt testimony at pg. i, lines 14-19.)
- Mr. Boldt's familiarity with the particular needs of rural customers and communities. (Boldt testimony at pg. i, lines 5-9.)
- The services available (or not available) at a Village Post Office, a Contract Postal Unit, and a full-service Post Office. (Boldt testimony at pg. 5, lines 13-21.)
- The availability of internet service (and speeds) in rural areas. (Boldt testimony at pp. 4-7.)
- Whether any coordinated planning or determination was made as to the 260 Post Offices "undergoing discontinuance review." (Boldt testimony at pp. 16-17.)

- The relative availability of “alternate access channels” in urban and rural communities. (Boldt testimony at pg. 2.)
- How the Retail Access Optimization Initiative comports with statutory requirements and guidance.
- The purpose of the witness’s testimony.
- Limited aspects of the tables, charts, and data provided by the witness. (See, e.g., testimony pp. 3-12, 21-22.)
- The contrast between and relative advantages of a “Top-Down Process” versus a “bottom-up” process.) (Advisory Opinion Request at pg. 7.)
- Anticipated cost or expense and revenue consequences of the discontinuance process and the Retail Access Optimization Initiative.
- Postal Service definitions of “Post Office,” “Postmaster,” “consolidation” and other terms employed in the Advisory Opinion Request.
- The survival rate and development prospects for rural areas, communities, or small towns with no post office.
- How the special services or non-postal needs of “special needs” or otherwise vulnerable customers in rural areas, communities, or small towns will be considered under the Retail Access Optimization Initiative.
- Support services for Postal Retail Facilities during the discontinuance process.

The foregoing topics are specific examples that are intended to be illustrative of similar and related topics the League is interested in addressing at the hearing.

Respectfully submitted this 2<sup>nd</sup> day of September, 2011.

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